



p 208-673-5335 / f 208-673-6200 / e atc@atcnet.net / a 225 W. North St. Albion, ID 83311
REDACTED - FOR PUBLIC INSPECTION

VIA ECFS

June 20, 2016

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Washington, D.C. 20554

RE: **REQUEST FOR CONFIDENTIAL TREATMENT**
WC Docket No. 14-58 - ETC Annual Reports and Certifications

Request that Information Submitted to the Commission be Withheld from Public Inspection Pursuant to 47 C.F.R. §0.459 and 5 U.S.C. §552(b)(4): Five-Year Service Quality Improvement Plan Progress Report included in FCC Form 481

Confidential Information - Subject to Protective Order Before the Federal Communications Commission

Dear Ms. Dortch:

In accordance with the annual reporting requirements of 47 C.F.R. §§54.313 and 54.422, Albion Telephone Company, Inc. (the Company), Study Area Code 472213 is submitting a completed FCC Form 481 to the Commission via its Electronic Comment Filing System (ECFS) in WC Docket No. 14-58. *The version of the Company's FCC Form 481 submitted via ECFS is a redacted version of the filing that contains no confidential information.*

The Company, by its authorized representative, hereby requests confidential treatment of two attachments to its FCC Form 481: (1) the five-year service quality improvement plan progress report and (2) the financial annual report, both of which were redacted in the ECFS submission. The request for confidential treatment of the five-year plan progress report is being made pursuant to Section 0.459 of the Commission's rules and Exemption 4 of the Freedom of Information Act (FOIA). The request for confidential treatment of the financial annual report is being made pursuant to the FCC's March 22, 2016 *Protective Order* in WC Docket Nos. 10-90 and 14-58. These attachments contain competitively sensitive data that Albion Telephone Company, Inc. maintains as confidential and does not normally make available to the public. Release of this information would have a substantial negative impact on the Company.

Five-Year Service Quality Improvement Plan Progress Report

Pursuant to Section 0.459 of the Commission's rules and Exemption 4 of FOIA, Albion Telephone Company, Inc. requests that the text and data extracted from its five-year service quality improvement plan progress report be withheld from public inspection because it contains competitively sensitive commercial and financial information that the Company keeps confidential. Public availability of this information would have a substantial negative impact on the Company.

In accordance with Section 0.459 of the Commission's rules, the following information is provided in support of this request:

- (1) Identification of the specific information for which confidential treatment is sought:

Attachment to Line 112 of FCC Form 481 – Five-Year Service Quality Improvement Plan Progress Report. Specifically, confidential treatment is sought for all information in the five-year plan progress report related to the Company's access line counts, existing broadband capabilities, and current and planned financial investments in its network that will improve service quality, service coverage, and/or service capacity for its customers.

- (2) Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission:

The information was submitted in WC Docket No. 14-58 as an attachment to FCC Form 481- the Carrier Annual Reporting Data Collection Form. Section 100 of FCC Form 481 requires incumbent local exchange carriers receiving high cost support to attach a progress report on its five-year service quality improvement plan, pursuant to 47 C.F.R. §54.313(a)(1).

- (3) Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged:

The five-year service quality improvement plan progress report contains granular information on the Company's access line counts and/or existing broadband capabilities as well as recent and planned capital investments in its network to improve service quality, service coverage, and/or service capacity. It also contains a map of the Company's service area detailing progress toward meeting broadband deployment targets at the wire center level. This is closely guarded, privileged information that the Company does not make publicly available.

- (4) Explanation of the degree to which the information concerns a service that is subject to competition:

Broadband is subject to increasing competition in the areas served by rural, rate-of-return incumbent local exchange carriers (RLECs). Virtually all RLECs face competition from one or more wireless Internet service providers. Most RLECs also face competition

from at least one other wireline broadband provider, such as a larger cable company, who will typically seek to “cherry pick” the lower cost portions of the study area. In addition, all RLECs face competition throughout their territories from satellite broadband providers.

- (5) Explanation of how disclosure of the information could result in substantial competitive harm:

Disclosure of the information contained in the five-year plan progress report would provide competitors with detailed, granular information regarding the Company’s access line count, its existing broadband capabilities, and its recent and planned network investments that improve service quality, coverage, and/or capacity for subscribers. This would give competitors valuable confidential information with which to develop their own strategies for investing in the service area, thereby bringing substantial competitive harm to the Company.

- (6) Identification of any measures taken by the submitting party to prevent unauthorized disclosure:

The Company has continually treated the extracted information in its five-year plan progress report as confidential and carefully controls the information to protect it from competitors. Access to the information is limited to employees that require it and to non-employees with confidentiality obligations such as lenders, consultants, auditors, and attorneys. In addition, when such information is required to be submitted to a state regulatory authority it has been filed as confidential information, not available to the public.

- (7) Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties:

The redacted information in the five-year plan progress report is not available to the public, and third-party access is limited as described in (6) above.

- (8) Justification of the period during which the submitting party asserts that material should not be available for public disclosure:

The Company requests that the extracted information be withheld from public inspection indefinitely. The information in the five-year plan progress report details the Company's most recent network upgrades in relation to its previously submitted service quality improvement plan. It may also contain upcoming planned network improvements during the five-year period ending 2019. This information would provide a very useful baseline for competitors for several years beyond that period.

- (9) Any other information that the party seeking confidential information treatment believes may be useful in assessing whether its request for confidentiality should be granted:

Exemption 4 of FOIA shields from public disclosure commercial or financial information obtained from a person that is privileged or confidential. Based on the responses provided above, the information in question satisfies this test.

Financial Annual Report

Section 3005 of FCC Form 481 requires a privately-held rate-of-return carrier receiving high cost support to attach a full and complete annual report of the company's financial condition and operations pursuant to 47 C.F.R. §54.313(f)(2). Albion Telephone Company, Inc. seeks confidential treatment of its financial annual report pursuant to the March 22, 2016 *Protective Order* in WC Docket Nos. 10-90 and 14-58.¹ The *Protective Order* specifically covers information filed pursuant to 47 C.F.R. §54.313(f)(2).

Albion Telephone Company, Inc. is providing to the Office of the Secretary, under seal, this cover letter and the Form 481 filing which includes the confidential information that is being requested to be withheld from public inspection.

Each page of the five-year service quality improvement plan progress report confidential submission bears the legend, "CONFIDENTIAL – NOT FOR PUBLIC DISCLOSURE."

Each page of the financial annual report confidential submission bears the legend, "CONFIDENTIAL INFORMATION – SUBJECT TO PROTECTIVE ORDER BEFORE THE FEDERAL COMMUNICATIONS COMMISSION."

The confidential information has also been submitted to the Universal Service Administrative Company through its E-File system as attachments to the FCC Form 481.

¹ *Connect America Fund, ETC Annual Reports and Certifications*, WC Docket Nos. 10-90 and 14-58, *Protective Order*, DA 16-296 (rel. Mar. 22, 2016).

In the filing submitted via ECFS, all pages containing confidential information bear the legend "REDACTED - FOR PUBLIC INSPECTION."

This cover letter includes no confidential information and the text is the same in both the non-redacted and redacted versions except for the confidentiality markings.

Please contact me if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Rich Redman", is written above the printed name.

Rich Redman
Vice President

—/pjf

Enclosures

**FCC Form 481 - Carrier Annual Reporting
Data Collection Form**FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	472213
<015>	Study Area Name	ALBION TEL CO-ATC
<020>	Program Year	2017
<030>	Contact Name: Person USAC should contact with questions about this data	Julie Laumb
<035>	Contact Telephone Number: Number of the person identified in data line <030>	2086735335 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	jlaumb@atccomm.com
	Form Type	54.313 and 54.422

**(100) Service Quality Improvement Reporting
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	472213
<015>	Study Area Name	ALBION TEL CO-ATC
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Julie Laumb
<035>	Contact Telephone Number - Number of person identified in data line <030>	2086735335 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jlaumb@atccomm.com

<110>	Has your company received its ETC certification from the FCC? If your answer to Line <110> is yes, do you have an existing \$54.202(a) "5 year plan" filed with the FCC?	<input checked="" type="radio"/> (yes / no) <input type="radio"/>
<111>		<input checked="" type="radio"/> (yes / no) <input type="radio"/>

If your answer to Line <111> is yes, please file a progress report, on line
<112> delineating the status of your company's existing \$ 54.202(a) "5 year
plan" on file with the FCC, as it relates to your provision of voice telephony
service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years,
your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a
CETC which only receives frozen support, your progress report is only
required to address voice telephony service.

472213id112.pdf

Name of Attached Document

Please select the appropriate responses below (Yes, No, Not Applicable) to confirm
that the attached document(s), on line 112, contains a progress report on its five-year
service quality improvement plan pursuant to §54.202(a). The information shall be
submitted at the wire center level or census block as appropriate.

<113>	Maps detailing progress towards meeting plan targets	Yes
<114>	Report how much universal service (USF) support was received	Yes
<115>	How much (USF) was used to improve service quality and how support was used to improve service quality	Yes
<116>	How much (USF) was used to improve service coverage and how support was used to improve service coverage	Yes
<117>	How much (USF) was used to improve service capacity and how support was used to improve service capacity	Yes
<118>	Provide an explanation of network improvement targets not met in the prior calendar year.	Yes

Study Area Code
<010>

<015>	Study Area Name
-------	-----------------

<020>	Program Year
-------	--------------

<030>	Contact Name - Person USAC should contact regarding this data
-------	---

<03>	Contact Telephone Number - Number of person identified in data line <030>	2086735335
------	---	------------

<039> Contact Email Address - Email Address of person identified in data line <030> j.laumb@atccomm.com

[illegible]

<210> For the prior calendar year, were there any reportable voice service outages?

	$\langle a \rangle$	$\langle b_1 \rangle$	$\langle b_2 \rangle$	$\langle b_3 \rangle$	$\langle b_4 \rangle$
$\langle 220 \rangle$					

[illegible]

(300) Unfulfilled Service Request
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010> Study Area Code	472213
<015> Study Area Name	ALBION TEL CO-RTC
<020> Program Year	2017
<030> Contact Name - Person USAC should contact regarding this data	Julie Laumb
<035> Contact Telephone Number - Number of person identified in data line <030>	2086735335 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	jlaumb@tccomm.com
<300> Unfulfilled service request (voice)	
<310> Detail on attempts (voice)	
<320> Unfulfilled service request (broadband)	
<330> Detail on attempts (broadband)	

Name of Attached Document

1

472213id330.pdf

Name of Attached Document

(400) Number of Complaints per 1,000 customers
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	472213
<015>	Study Area Name	ALBION TEL CO-ATC
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Julie Laub
<035>	Contact Telephone Number - Number of person identified in data line <030>	2086735335 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jlaub@atccom.com
<400>	Select from the drop-down list to indicate how you would like to report voice complaints (zero or greater) for voice telephony service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize.	Offered only fixed voice
<410>	Complaints per 1000 customers for fixed voice	0.0
<420>	Complaints per 1000 customers for mobile voice	
<430>	Select from the drop-down list to indicate how you would like to report end-user customer complaints (zero or greater) for broadband service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize.	Offered only fixed broadband
<440>	Complaints per 1000 customers for fixed broadband	0.0
<450>	Complaints per 1000 customers for mobile broadband	

**(500) Compliance With Service Quality Standards and Consumer Protection Rules
Data Collection Form**FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	472213
<015>	Study Area Name	ALBION TEL CO-ATC
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Julie Laumb
<035>	Contact Telephone Number - Number of person identified in data line <030>	2086735335 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jlaumb@atccomm.com
<500>	Certify compliance with applicable service quality standards and consumer protection rules	Yes
472213id510.pdf		
<510>	Descriptive document for Service Quality Standards & Consumer Protection Rules Compliance	

(600) Functionality in Emergency Situations
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	472213
<015>	Study Area Name	ALBION TEL CO-ATC
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Jolie Laub
<035>	Contact Telephone Number - Number of person identified in data line <030>	2086735335 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jlaub@atccomm.com
<600>	Certify compliance regarding ability to function in emergency situations	Yes
<610>	Descriptive document for Functionality in Emergency Situations	472213id610.pdf

<010>	Study Area Code	472213
<015>	Study Area Name	ALBION TEL CO-ATC
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Julie Jaumb
<035>	Contact Telephone Number - Number of person identified in data line <030>	2086735335 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jjaumb@atccomm.com

[illegible]

[800] Operating Companies Data Collection Form			
		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013	
<010>	Study Area Code	472213	
<015>	Study Area Name	ALBION TEL CO-ATC	
<020>	Program Year	2017	
<030>	Contact Name - Person USAC should contact regarding this data	Julie Laumb	
<035>	Contact Telephone Number - Number of person identified in data line <030>	2086735335 ext.	
<039>	Contact Email Address - Email Address of person identified in data line <030>	jlaumb@atccomm.com	
<810>	Reporting Carrier	Albion Telephone Company, Inc.	
<811>	Holding Company	Not Applicable	
<812>	Operating Company	Albion Telephone Company, Inc.	

[illegible]

<900> Does the filing entity offer tribal land services? (Y/N)

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

[illegible]

<921>	Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
<922>	Feasibility and sustainability planning;
<923>	Marketing services in a culturally sensitive manner;
<924>	Compliance with Rights of way processes
<925>	Compliance with Land Use permitting requirements
<926>	Compliance with Facilities Siting rules
<927>	Compliance with Environmental Review processes
<928>	Compliance with Cultural Preservation review processes
<929>	Compliance with Tribal Business and Licensing requirements.

**(1000) Voice and Broadband Service Rate Comparability
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	472213
<015>	Study Area Name	ALBION TEL CO-ATC
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Julie Laumb
<035>	Contact Telephone Number - Number of person identified in data line <030>	2086735335 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jlaumb@atccomm.com

<1000> Voice services rate comparability certification

Yes

472213id1010.pdf

<1010> Attach detailed description for voice services rate comparability compliance

Name of Attached Document

Yes - Pricing is no more than the most recent applicable benchmark announced by the Wireline Competition Bureau

<1020> Broadband comparability certification

<1030> Attach detailed description for broadband comparability compliance

472213id1030.pdf

Name of Attached Document

**[1100] No Terrestrial Backhaul Reporting
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	472213
<015>	Study Area Name	ALBION TEL CO-ATC
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Julie Iaumb
<035>	Contact Telephone Number - Number of person identified in data line <030>	2086735335 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jlaumb@atccomm.com

<1100> Certify whether terrestrial backhaul options exist (Y/N)

Yes

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

(1200) Terms and Condition for Lifeline Customers

Lifeline

Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	472213
<015>	Study Area Name	AUBION TEL CO-RTC
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Julie Laumb
<035>	Contact Telephone Number - Number of person identified in data line <030>	2086735335 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jlaumb@atccomm.com

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

<1220> Link to Public Website

HTTP

www.atcnet.net/itsap-lifeline

Name of Attached Document

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

<1221>	Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,	<input checked="" type="checkbox"/>
<1222>	Details on the number of minutes provided as part of the plan,	<input checked="" type="checkbox"/>
<1223>	Additional charges for toll calls, and rates for each such plan.	<input checked="" type="checkbox"/>

(2000) Price Cap Carrier Additional Documentation		FCC Form 481
Data Collection Form		OMB Control No. 3060-0986/OMB Control No. 3060-0819
Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers		July 2013

<010>	Study Area Code	472213
<015>	Study Area Name	ALBION TEL CO-ATC
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Julie Laumb
<035>	Contact Telephone Number - Number of person identified in data line <030>	208735335 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jlaumb@atccomm.com

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

<2010> 2nd Year Certification 47 CFR § 54.313(b)(1)(i) - Note that for the July 1 2016 certification, this applies to Round 2 recipients of Incremental Support

<2011> 3rd Year Certification 47 CFR § 54.313(b)(1)(ii) - Note that for the July 1 2016 certification, this applies to Round 1 recipients of Incremental Support

<2022> Recipient certifies, representing year two after filing a notice of acceptance of funding pursuant to 54.312(c), that the locations in question are not receiving support under the Broadband Initiatives Program or the Broadband Technology Opportunities Program for projects that will provide broadband with speeds of at least 4 Mbps/1Mbps - 54.313(b)(2)(i). Round 2 recipients only.

<2023> The attachment on line 2024 includes a statement of the total amount of capital funding expended in the previous year in meeting Connect America Phase I deployment obligations, accompanied by a list of census blocks indicating where funding was spent. This covers year two - 54.313(b)(2)(ii). Round 2 recipients only.

<2024A> Round 2 Recipient of Incremental Support?

<2024B> Attach list of census blocks indicating where funding was spent in year two - 54.313(b)(2)(ii). Round 2 recipients only.

<2025A> Round 1 or Round 2 Recipient of Incremental Support?

<2025B> Attach geocoded Information for Phase I milestone reports (Round 1 for year three and Round 2 for year two) - Connect America Fund, WC Docket 10-90, Report and Order, FCC 13-

<2015> 2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)

Name of Attached Document Listing
Required Information

Name of Attached Document Listing
Required Information

(2000) Price Cap Carrier Additional Documentation (Continued)

Data Collection Form

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013**Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}**

<2016> Certification support used to build broadband

Connect America Phase II Reporting {47 CFR § 54.313(e)}

<2017A> Connect America Fund Phase II recipient?

<2017B> Attach information for Phase II - 54.313(e)(1) - list of geocoded locations already meeting the 54.309 public interest obligations at the end of calendar year 2015 and total amount of Phase II support, if any, the price

cap carrier used for capital expenditures in 2015.

<2018> Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(2)(ii)

<2019> Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(2)(v)

<2020> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 40% of its supported locations in the state on December 31, 2017 - 54.313(e)(3)

<2021> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 60% of its supported locations in the state on December 31, 2018 - 54.313(e)(4)

<2026> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 80% of its supported locations in the state on December 31, 2019 - 54.313(e)(5)

<2027> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 100% of its supported locations in the state on December 31, 2020 - 54.313(e)(6)

Name of Attached Document Listing
Required InformationName of Attached Document Listing
Required Information

<010>	Study Area Code	472213
<015>	Study Area Name	ALBION TEL CO-ATC
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Julie Laumb
<035>	Contact Telephone Number - Number of person identified in data line <030>	2086735335 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jlaumb@atccomm.com

Complete the items below to note compliance with five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3009)	Progress Report on 5 Year Plan Carrier certifies to 54.313(f)(1)(iii)		
(3010A)	Milestone Certification {47 CFR § 54.313(f)(1)(i)}	Yes - Attach Certification	
(3010B)	Please Provide Attachment	Name of Attached Document Listing Required Information	472213id3010.pdf
(3012A)	Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii))	No - No New Community Anchors	
(3012B)	Please Provide Attachment	Name of Attached Document Listing Required Information	
(3013)	Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))	(Yes/No)	<input checked="" type="radio"/> <input type="radio"/>
(3014)	If yes, does your company file the RUS annual report	(Yes/No)	<input checked="" type="radio"/> <input type="radio"/>
	Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:		
(3015)	Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)		<input checked="" type="checkbox"/>
(3016)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows		<input checked="" type="checkbox"/>
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	Name of Attached Document Listing Required Information	472213id3017.pdf
(3018)	If the response is no on line 3014, is your company audited? If the response is yes on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:	(Yes/No)	<input type="radio"/> <input type="radio"/>
(3019)	Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers		<input type="checkbox"/>
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(3021)	Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit. If the response is no on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:		<input type="checkbox"/>
(3022)	Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers		<input type="checkbox"/>
(3023)	Underlying information subjected to a review by an independent certified public accountant		<input type="checkbox"/>
(3024)	Underlying information subjected to an officer certification.		<input type="checkbox"/>
(3025)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(3026)	Attach the worksheet listing required information	Name of Attached Document Listing Required Information	

(3005) Rate Of Return Carrier Additional Documentation (Continued)

Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<01>	Study Area Code	472213
<015>	Study Area Name	ALBION TEL CO-NTC
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Julie Laumb
<035>	Contact Telephone Number - Number of person identified in data line <030>	2086735335 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jlaumb@tccomm.com

Financial Data Summary

(3027) Revenue	9005792
(3028) Operating Expenses	6388286
(3029) Net Income	2087707
(3030) Telephone Plant In Service(TPIS)	46110282
(3031) Total Assets	29285873
(3032) Total Debt	10985399
(3033) Total Equity	29285873
(3034) Dividends	1177741

Name of Attached Document Listing Required Information

<010>	Study Area Code	472213
<015>	Study Area Name	ALBION TEL CO-ATC
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Julie Launb
<035>	Contact Telephone Number - Number of person identified in data line <030>	2086735335 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jlaunb@atccomm.com

4005 Rural Broadband Experiment

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations, provide a list of newly served community anchor institutions, and provide a list of locations where broadband has been deployed.

Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)

Please address Line 4001 regarding compliance with the Commission's public interest obligations. All RBE participants must provide a response to Line 4001.

4001. Recipient certifies that it is offering broadband to the identified locations meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas?

Community Anchor Institutions – FCC 14-98 (paragraph 79)

4003a. RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

If yes to 4003A, please provide a response for 4003B.

4003b. Provide the number, names and addresses of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year.

Name of Attached Document Listing Required Information _____

Broadband Deployment Locations – FCC 14-98 (paragraph 80)

4004a. Attach a list of geocoded locations to which broadband has been deployed as of the June 1st immediately preceding the July 1st filing deadline for the FCC Form 481.

Name of Attached Document Listing Required Information _____

4004b. Attach evidence demonstrating that the recipient is meeting the relevant public service obligations for the identified locations. Materials must at least detail the pricing, offered broadband speed and data usage allowances available in the relevant geographic area.

Name of Attached Document Listing Required Information _____

Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

<010> Study Area Code	472213
<015> Study Area Name	ALBION TEL CO-ATC
<020> Program Year	2017
<030> Contact Name - Person USAC should contact regarding this data	Julie Laumb
<035> Contact Telephone Number - Number of person identified in data line <030>	208 6735335 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	jlaumb@atccomm.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	ALBION TEL CO-ATC
Signature of Authorized Officer:	CERTIFIED ONLINE Date 06/20/2016
Printed name of Authorized Officer:	Richard Rodman
Title or position of Authorized Officer:	Vice President
Telephone number of Authorized Officer:	208 6735335 ext.
Study Area Code of Reporting Carrier:	472213 Filing Due Date for this form: 07/01/2016
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Certification - Agent / Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

<010> Study Area Code	472213
<015> Study Area Name	ALBION TEL CO-ATC
<020> Program Year	2017
<030> Contact Name - Person USAC should contact regarding this data	Julie Laumb
<035> Contact Telephone Number - Number of person identified in data line <030>	208 673 5335 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	jlaumb@atccosa.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent: _____	
Name of Reporting Carrier: _____	
Signature of Authorized Officer: _____	Date: _____
Printed name of Authorized Officer: _____	
Title or position of Authorized Officer: _____	
Telephone number of Authorized Officer: _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier: _____	
Name of Authorized Agent Firm: _____	
Signature of Authorized Agent or Employee of Agent: _____	Date: _____
Name of Authorized Agent Employee: _____	
Title or position of Authorized Agent or Employee of Agent: _____	
Telephone number of Authorized Agent or Employee of Agent: _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Attachments

Albion Telephone Company, Inc. (Albion) submits its five year progress report for the Service Quality Improvement pursuant to c.F.R. 54.313(a)(1) detailing its progress towards meeting its targets for improvement and upgrade to Albion's network throughout its service area.

This progress report details how Albion continues to meet its broadband obligations within its service area, completes service requests within a reasonable amount of time and provides reliable state of the art telecommunications services within its study area that includes rural customers in 12 exchanges. The projects listed within the progress report are designed to continue to provide improved service quality, improved service coverage, and improve service capacity within the wirecenter boundaries of Albion. In addition, this progress report provides sufficient data that details capital and operational expenditures, the amount of USF received allocated between capital and operational expenditures. All USF funds received and detailed within this progress reports was used in accordance with federal rules and regulations towards improving service quality, service coverage, and service capacity.

Voice Network Upgrades: 2015

Project Description	Area Served/Wire center	Estimated Start Date	Estimated Completion Date	Estimated Population Served	Status Report
Yost to Beehive Fiber - Connect two previously unconnected exchanges by fiber for rings and redundancy of networks	ALBNIDXCDSO	March 2015	September 2015	[REDACTED]	Canceled, No Customer Demand
Declo to Raft River Fiber - Connect two exchanges by fiber for rings and redundancy of networks	ALBNIDXCDSO	March 2015	September 2015	[REDACTED]	No progress waiting for customer order.
Anchor Institutions - Replace copper with fiber at anchor institutions	ALBNIDXCDSO	May 2015	September 2015	[REDACTED]	Completed

REDACTED FOR PUBLIC INSPECTION

Broadband Upgrades, 2015

Project Description	Area		Estimated Population Served	Status Report
	Served/Wire center	Estimated Start Date	Estimated Completion Date	
Yost to Beehive Fiber - Connect two previously unconnected exchanges by fiber for rings and redundancy of networks	ALBNIDXCDSO	March 2015	September 2015	Canceled, No Customer Demand
Delco to Raft River Fiber - Connect two exchanges by fiber for rings and redundancy of networks	ALBNIDXCDSO	March 2015	September 2015	No progress waiting for customer order.
Anchor Institutions - Replace copper with fiber at anchor institutions	ALBNIDXCDSO	May 2015	September 2015	Completed

REDACTED FOR PUBLIC INSPECTION

Voice Network Upgrades: 2015

Project Description	Area Served/Wire center	Estimated Start Date	Estimated Completion Date	Estimated Population Served	Status Report
Anchor Institutions - Replace copper with fiber at anchor institutions	ARCOIDXCDSO	May 2015	September 2015		Completed
Yost to Beehive Fiber - Connect two previously unconnected exchanges by fiber for rings and redundancy of networks	ARCOIDXCDSO	March 2015	September 2015		Canceled, No customer demand.

Broadband Upgrades: 2015

Project Description	Area Served/Wire center	Estimated Start Date	Estimated Completion Date	Estimated Population Served	Status Report
Anchor Institutions - Replace copper with fiber at anchor institutions	ARCOIDXCDSO	May 2015	September 2015		Completed
Yost to Beehive Fiber - Connect two previously unconnected exchanges by fiber for rings and redundancy of networks	ARCOIDXCDSO	March 2015	September 2015		Canceled, No customer demand.

REDACTED FOR PUBLIC INSPECTION

Voice Network Upgrades: 2015

Project Description	Area Served/Wire center	Estimated Start Date	Estimated Completion Date	Estimated Population Served	Status Report
Maladi Fiber to the Premise - Replace copper with fiber for all customers in the Maladi Exchange	MLCYIDXCD50	January 2015	December 2016		Construction in progress. Started May 2015
Juniper to Holbrook Fiber - Connect two previously unconnected exchanges by fiber for rings and redundancy of networks	MLCYIDXCD50	March 2015	September 2015		Completed
Yost to Beehive Fiber - Connect two previously unconnected exchanges by fiber for rings and redundancy of networks	MLCYIDXCD50	March 2105	September 2015		Canceled, no customer demand.
Declo to Raft River Fiber - Connect two exchanges by fiber for rings and redundancy of networks.	MLCYIDXCD50	March 2015	September 2015		Waiting on customer order.
Holbrook FAA Fiber to the Premise - Replace copper with fiber for customers in the Holbrook Exchange	MLCYIDXCD50	May 2015	September 2015		Delayed due to more urgent projects.
Power Plant Upgrade	MLCYIDXCD50	May 2015	September 2015		Completed
T1 add/electronics-core carrier ethernet - card add (FTTP)	MLCYIDXCD50	January 2015	December 2015		Completed

Broadband Upgrades- 2015

Project Description	Area Served/Wire center	Estimated Start Date	Estimated Completion Date	Estimated Population Served	Status Report
Malad Fiber to the Premise - Replace copper with fiber for all customers in the Malad Exchange	MLCYIDXCD50	January 2015	December 2016		Construction in progress. Started May 2015
Juniper to Holbrook Fiber - Connect two previously unconnected exchanges by fiber for rings and redundancy of networks	MLCYIDXCD50	March 2015	September 2015		Completed
Yost to Beehive Fiber - Connect two previously unconnected exchanges by fiber for rings and redundancy of networks	MLCYIDXCD50	March 2105	September 2015		Canceled, no customer demand.
Declo to Raft River Fiber - Connect two exchanges by fiber for rings and redundancy of networks.	MLCYIDXCD50	March 2015	September 2015		Waiting on customer order.
Holbrook FAA Fiber to the Premise - Replace copper with fiber for customers in the Holbrook Exchange	MLCYIDXCD50	May 2015	September 2015		Delayed due to more urgent projects.
Power Plant Upgrade	MLCYIDXCD50	May 2015	September 2015		Completed
T1 add/electronics-core carrier ethernet - card add (FTTP)	MLCYIDXCD50	January 2015	December 2015		Completed

REDACTED FOR PUBLIC INSPECTION

Albion 472213

CapEx

2015

2110 Land & General Support

2210 Central Office Switching

2230 Central Office Transmission

2410 Cable & Wire Facilities

Total Capital Expenditures

OpEx

Plant Specific

Plant Nonspecific

Depreciation

Customer Operations

Corporate Operations

Total Operating Expenses

USF YTD (1/15 - 6/15)

HCL

ICLS

SNA

ICC

Total YTD

USF BreakOut

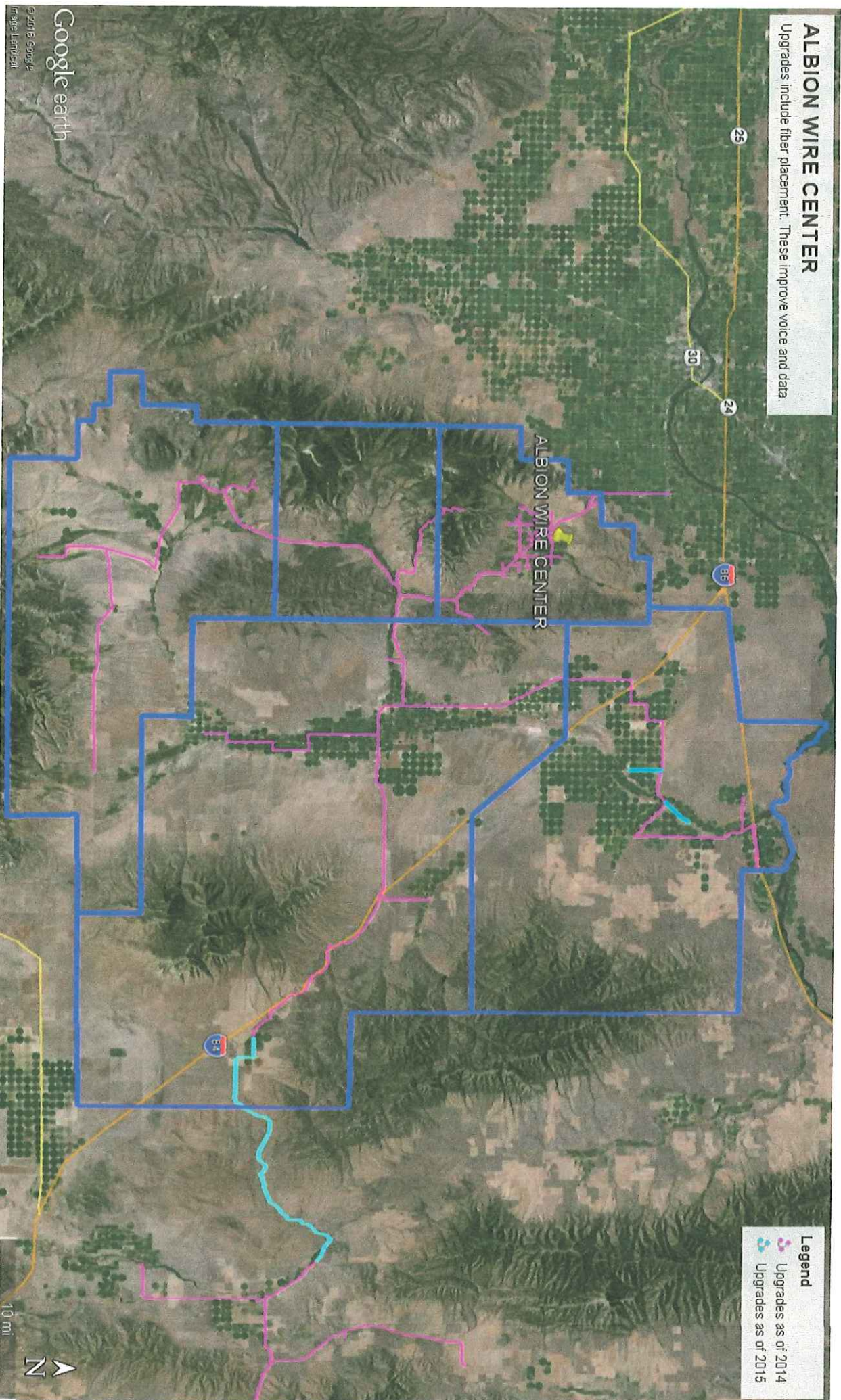
CapEx USF

OpEx USF

REDACTED FOR PUBLIC INSPECTION

ALBION WIRE CENTER

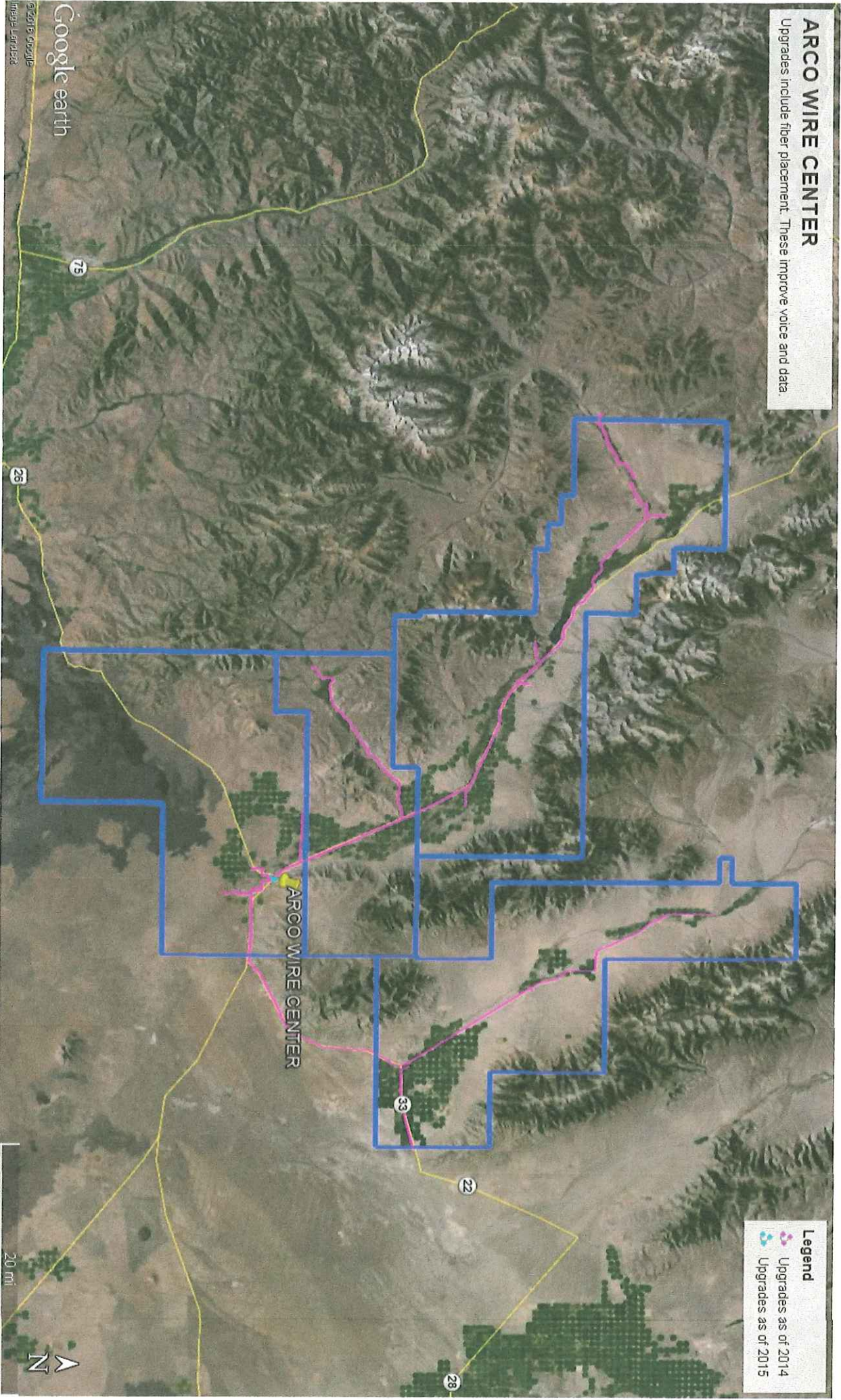
Upgrades include fiber placement. These improve voice and data.



Legend
Upgrades as of 2014
Upgrades as of 2015

ARCO WIRE CENTER

Upgrades include fiber placement. These improve voice and data.



Google earth

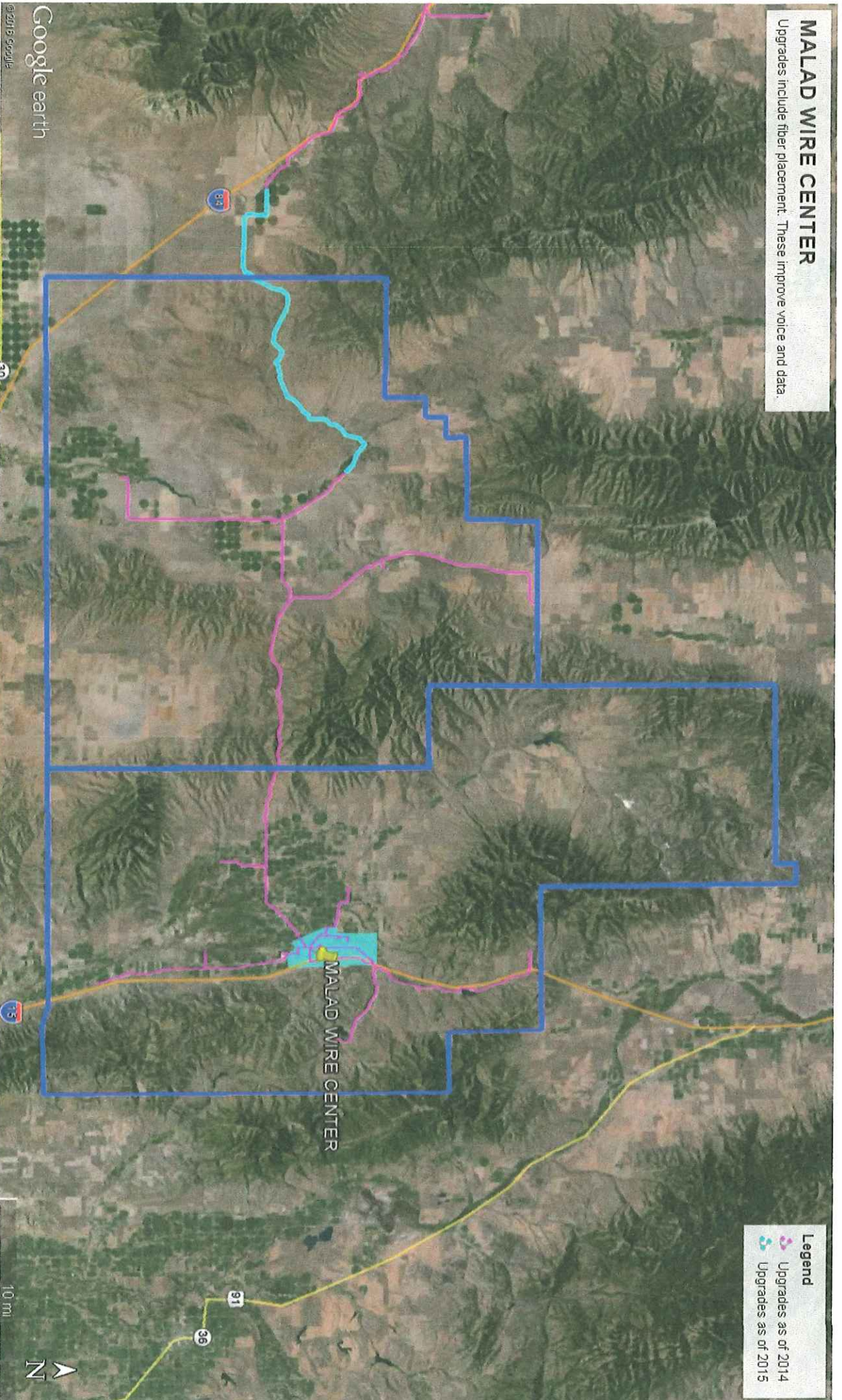
© 2015 Google
Images provided

Legend

- Upgrades as of 2014
- Upgrades as of 2015

MALAD WIRE CENTER

Upgrades include fiber placement. These improve voice and data.



Response Line 330
Albion Telephone Company, Inc.
Study Area 472213

Broadband Network

We had one unfulfilled request for Broadband services. The customer currently has voice service with us but they are over 5 miles from our nearest cabinet. This is too far out for a modem to sink up. Notified the customer of the situation.

Response Line 510
Albion Telephone Company, Inc.
Study Area 472213

Voice Network

Pursuant to 47 C.F.R. § 54.313(a)(5) and or 47 C.F.R. § 54.422(b)(3) Albion Telephone Company, Inc. ("ILEC") is in compliance with appropriate FCC Service Quality Standards and Consumer Protection Rules. ILEC provides CPNI training to all of its new employees and in addition trains all of its existing employees on an annual basis. ILEC also conducts subscriber outreach regarding CPNI by placing CPNI explanation onto its website at www.atcnet.net which informs subscribers about CPNI rules and explains Idaho Public Utility commission rules regarding customer relations. In addition ILEC trains staff on Red Flag issues on an annual basis. All company employees are required to sign and acknowledge that they have completed CPNI and Red Flag training and understand obligations to adherence of applicable rules.

ILEC also outlines its rates, terms, and conditions under which ILEC offers service in its Local Exchange Tariff. The tariff explains customer rights and obligations, customer service, dispute resolution, deposits, billing and payment options, disconnection of service as well as cancellation of service options. ILEC keeps its tariffs available for public inspection at its business offices.

Broadband Network

Pursuant to 47 C.F.R. § 54.313(a)(5) and or 47 C.F.R. § 54.422(b)(3) Albion Telephone Company, Inc. ILEC is in compliance with applicable FCC Service Quality Standards and Consumer Protection Rules. ILEC trains staff on applicable rules for broadband services issues on an annual basis. In addition ILEC has placed on its website at www.atcnet.net its network practices and policies regarding FCC's Net Neutrality Rules.

ILEC also outlines its rates, terms, and conditions under which ILEC offers Broadband service in NECA Tariff #5 to Internet Service Providers ("ISP"). The Tariff explains customer rights and obligations, customer service, dispute resolution, deposits, billing and payment options, disconnection of service as well as cancellation of service options. Public inspection of NECA Tariff #5 can be found on NECA's website. Retail DSL rates, terms, and conditions for retail services are provided by the ISP.

Response Line 610
Albion Telephone Company, Inc
Study Area 472213

Functionality in Emergency Situations:

Voice Network

Pursuant to 47 C.F.R. § 54.313(a)(6) and 47 C.F.R § 54.22(b)(4) as set forth in 47 C.F.R. § 54.202(a)(2) Albion Telephone Company, Inc. ("ILEC") meets the requirements to remain functional in emergency situations and has the following capabilities: Back-up power is provided to ILEC central offices by use of a generator and batteries that provide it with 8 to 12 hours of emergency power. In addition, ILEC field electronics have 8 to 12 hours of back-up power by use of generators and batteries. ILEC also has ERP, SONET, DWDM, and MPLS technology deployed in its core fiber optic network that is a self-healing and will automatically reroute traffic should a fiber cut occur. ILEC has also sufficient spare cards for its fiber optic network to provide almost instantaneous replacement should there ever be a card failure in the core network. ILEC also has proper staff in place to repair any fiber cuts in a timely manner. ILEC has connectivity with neighboring telephone exchanges as well as the LATA tandem to provide diverse options to reroute traffic should an emergency arise. ILEC has developed and trained its staff on network preparedness plans in case of emergency situations. ILEC is prepared and capable of managing traffic spikes resulting from emergency situations and has sufficient switching capabilities to handle such situations.

Broadband Network

Pursuant to 47 C.F.R. § 54.313(a)(6) and 47 C.F.R § 54.22(b)(4) as set forth in 47 C.F.R. § 54.202(a)(2) Albion Telephone Company, Inc. ("ILEC") meets the requirements to remain functional in emergency situations and has the following capabilities: Back-up power is provided to ILEC central offices by use of a generator and batteries that provide it with 8 to 12 hours of emergency power that is also used to provide service to the broadband network. In addition, ILEC field electronics have 8 to 12 hours of back-up power by use of generators and batteries. ILEC also has ERP, SONET, DWDM, and MPLS technology deployed in its core fiber optic network that is a self-healing and will automatically reroute broadband traffic should a fiber cut occur. ILEC has also sufficient spare cards for its fiber optic network to provide almost instantaneous replacement should there ever be a card failure in the core network. ILEC also has proper staff in place to repair any fiber cuts in a timely manner. ILEC has connectivity with neighboring telephone exchanges as well as the LATA tandem to provide diverse options to reroute traffic should an emergency arise. ILEC has developed and trained its staff on network preparedness plans in case of emergency situations.

(700) Price Offerings including Voice Rate Data
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010> Study Area Code 472213
<015> Study Area Name ALBION TEL CO-ATC
<020> Program Year 2017
<030> Contact Name - Person USAC should contact regarding this data Julie Laumb
<035> Contact Telephone Number - Number of person identified in data line <030> 2086735335 ext.
<039> Contact Email Address - Email Address of person identified in data line <030> jlaumb@atccomm.com

<701> Residential Local Service Charge Effective Date 1/1/2016
<702> Single State-wide Residential Local Service Charge

<703>

<a1>	<a2>	<a3>	<b1>	<b2>	<b3>	<b4>	<b5>	<c>
State	Exchange (ILEC)	SAC (CETC)	Rate Type	Residential Local Service Rate	State Subscriber Line Charge	State Universal Service Fee	Mandatory Extended Area Service Charge	Total per line Rates and Fees
ID	ALBION		FR	25.76	0.0	0.12	0.0	25.88
ID	ALBION 1		MS	16.0	0.0	0.12	0.0	16.12
ID	ALBION2		MS	16.0	0.0	0.12	0.0	16.12
ID	ALMO		FR	25.76	0.0	0.12	0.0	25.88
ID	ALMO1		MS	16.0	0.0	0.12	0.0	16.12
ID	ALMO2		MS	16.0	0.0	0.12	0.0	16.12
ID	ARCO		FR	25.76	0.0	0.12	0.0	25.88
ID	ARCO1		MS	16.0	0.0	0.12	0.0	16.12
ID	ARCO2		MS	16.0	0.0	0.12	0.0	16.12
ID	ELBA		FR	25.76	0.0	0.12	0.0	25.88
ID	ELBA1		MS	16.0	0.0	0.12	0.0	16.12
ID	ELBA2		MS	16.0	0.0	0.12	0.0	16.12
ID	HOLBROOK		FR	25.76	0.0	0.12	0.0	25.88
ID	HOLBROOK1		MS	16.0	0.0	0.12	0.0	16.12
ID	HOLBROOK2		MS	16.0	0.0	0.12	0.0	16.12
ID	HOWE		FR	25.76	0.0	0.12	0.0	25.88
ID	HOWE1		MS	16.0	0.0	0.12	0.0	16.12
ID	HOWE2		MS	16.0	0.0	0.12	0.0	16.12
ID	MACKAY		FR	25.76	0.0	0.12	0.0	25.88
ID	MACKAY1		MS	16.0	0.0	0.12	0.0	16.12
ID	MACKAY2		MS	16.0	0.0	0.12	0.0	16.12

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

1/1/2016

	Residential Local Service Charge Effective Date	Single State-wide Residential Local Service Charge
<701>		
<702>		

<703>

[illegible]

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

472213

ALBION TEL CO-ATC

2017

Julie Laumb

2086735335 ext.

jlaumb@atccomm.com

flaumb@atccomm.com

[illegible]

Response to Line 1010
Albion Telephone Company, Inc.
472213

Voice Services Comparability Report

Pursuant to 47 C.F.R. § 54.313 (a) (10) Albion Telephone Company, Inc. ("ATC") is in compliance with the requirement that voice services is no more than two standard deviations above the national average urban rate for voice service of \$41.07 as specified in Public Notice DA 16-362 issued on April 5, 2016. ATC's current total local end-user rate¹ of \$25.88 (which includes a local fee of \$0.00, mandated state fee of \$0.12 and surcharges and any EAS) is not above the standard deviation as specified in the USF/ICC Transformation Order.²

¹ Local End User Rate as defined in USF/ICC Transformation Order 26 FCC Rcd at 17751, Para. 238

² USF/ICC Transformation Order, 26 FCC Rcd at 17694, Para. 84 (footnote included) "The standard deviation is a measure of dispersion. The sample standard deviation is the square root of the sample variance. The sample variance is calculated as the sum of the squared deviations of the individual observations in the sample of data from the sample average divided by the total number of observations in the sample minus one. In a normal distribution, about 68 percent of the observations lie within one standard deviation above and below the average and about 95 percent of the observations lie within two standard deviations above and below the average."

Response to Line 1030
Albion Telephone Company, Inc.
472213

Broadband Services Comparability Report

Pursuant to 47 C.F.R. § 54.313 (a) (11) Albion Telephone Company, Inc. ("ATC") charges a residential rate of \$59.95 for broadband providing 10 Mbps download, 10 Mbps upload, and an unlimited usage allowance. This rate is lower than \$75.20, which is the 2016 reasonable comparability benchmark for the same offering established by the Wireline Competition Bureau.¹

¹ *Wireline Competition Bureau Announces Results of 2016 Urban Rate Survey for Fixed Voice and Broadband Services and Posting of Survey Data and Explanatory Notes*, Public Notice, WC Docket No. 10-90, DA 16-362 (rel. April 6, 2016).

Response to Line 3010
Albion Telephone Company, Inc.
472213

Milestone Certification

Pursuant to 47 C.F.R. § 54.202(a) Albion Telephone Company, Inc. ("ATC") provides this certification that it is taking reasonable steps to provide upon reasonable request broadband speeds of at least 10 Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to offerings in urban areas as determined in an annual survey as specified in Public Notice DA 16-362, and that requests for such service are met within a reasonable amount of time. Details for how CTTC is meeting its obligations for meeting its goals and required obligations are specified within the FCC Form 481 annual filing.

USDA-RUS

This data will be used by RUS to review your financial situation. Your response is required by 7 U.S.C. 901 et seq. and, subject to federal laws and regulations regarding confidential information, will be treated as confidential.

BORROWER NAME

Albion Telephone Company

(Prepared with Audited Data)

OPERATING REPORT FOR
TELECOMMUNICATIONS BORROWERS

INSTRUCTIONS-Submit report to RUS within 30 days after close of the period.
For detailed instructions, see RUS Bulletin 1744-2. Report in whole dollars only.

PERIOD ENDING
December, 2015

BORROWER DESIGNATION
ID0504

CERTIFICATION

We hereby certify that the entries in this report are in accordance with the accounts and other records of the system and reflect the status of the system to the best of our knowledge and belief.

ALL INSURANCE REQUIRED BY 7 CFR PART 1788, CHAPTER XVII, RUS, WAS IN FORCE DURING THE REPORTING PERIOD AND RENEWALS HAVE BEEN OBTAINED FOR ALL POLICIES.

DURING THE PERIOD COVERED BY THIS REPORT PURSUANT TO PART 1788 OF 7CFR CHAPTER XVII

(Check one of the following)

☒ All of the obligations under the RUS loan documents have been fulfilled in all material respects.

☐ There has been a default in the fulfillment of the obligations under the RUS loan documents. Said default(s) is/are specifically described in the Telecom Operating Report

Richard Redman

3/21/2016

DATE

PART A. BALANCE SHEET

ASSETS	BALANCE PRIOR YEAR	BALANCE END OF PERIOD	LIABILITIES AND STOCKHOLDERS' EQUITY	BALANCE PRIOR YEAR	BALANCE END OF PERIOD
CURRENT ASSETS			CURRENT LIABILITIES		
1. Cash and Equivalents			25. Accounts Payable		
2. Cash-RUS Construction Fund			26. Notes Payable		
3. Affiliates:			27. Advance Billings and Payments		
a. Telecom, Accounts Receivable			28. Customer Deposits		
b. Other Accounts Receivable			29. Current Mat. L/T Debt		
c. Notes Receivable			30. Current Mat. L/T Debt-Rur. Dev.		
4. Non-Affiliates:			31. Current Mat.-Capital Leases		
a. Telecom, Accounts Receivable			32. Income Taxes Accrued		
b. Other Accounts Receivable			33. Other Taxes Accrued		
c. Notes Receivable			34. Other Current Liabilities		
5. Interest and Dividends Receivable			35. Total Current Liabilities (25 thru 34)		
6. Material-Regulated			LONG-TERM DEBT		
7. Material-Nonregulated			36. Funded Debt-RUS Notes		
8. Prepayments			37. Funded Debt-RTB Notes		
9. Other Current Assets			38. Funded Debt-FFB Notes		
10. Total Current Assets (1 Thru 9)			39. Funded Debt-Other		
NONCURRENT ASSETS			40. Funded Debt-Rural Develop. Loan		
1. Investment in Affiliated Companies			41. Premium (Discount) on L/T Debt		
a. Rural Development			42. Recacquired Debt		
b. Nonrural Development			43. Obligations Under Capital Lease		
2. Other Investments			44. Adv. From Affiliated Companies		
a. Rural Development			45. Other Long-Term Debt		
b. Nonrural Development			46. Total Long-Term Debt (36 thru 45)		
3. Nonregulated Investments			OTHER LIAB. & DEF. CREDITS		
4. Other Noncurrent Assets			47. Other Long-Term Liabilities		
5. Deferred Charges			48. Other Deferred Credits		
6. Jurisdictional Differences			49. Other Jurisdictional Differences		
7. Total Noncurrent Assets (11 thru 16)			50. Total Other Liabilities and Deferred Credits (47 thru 49)		
PLANT, PROPERTY, AND EQUIPMENT			EQUITY		
8. Telecom, Plant-In-Service			51. Cap. Stock Outstand. & Subscribed		
9. Property Held for Future Use			52. Additional Paid-In-Capital		
10. Plant Under Construction			53. Treasury Stock		
1. Plant Adj., Nonop. Plant & Goodwill			54. Membership and Cap. Certificates		
2. Less Accumulated Depreciation			55. Other Capital		
3. Net Plant (18 thru 21 less 22)			56. Patronage Capital Credits		
4. TOTAL ASSETS (10+17+23)			57. Retained Earnings or Margins		
			58. Total Equity (51 thru 57)		
			59. TOTAL LIABILITIES AND EQUITY (35+46+50+58)		

Total Equity = % of Total Assets


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USDA-RUS OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS		BORROWER DESIGNATION ID0504	
INSTRUCTIONS- See RUS Bulletin 1744-2		PERIOD ENDING December, 2015	
PART B. STATEMENTS OF INCOME AND RETAINED EARNINGS OR MARGINS			
ITEM		PRIOR YEAR	THIS YEAR
1. Local Network Services Revenues			
2. Network Access Services Revenues			
3. Long Distance Network Services Revenues			
4. Carrier Billing and Collection Revenues			
5. Miscellaneous Revenues			
6. Uncollectible Revenues			
7. Net Operating Revenues (1 thru 5 less 6)			
8. Plant Specific Operations Expense			
9. Plant Nonspecific Operations Expense (Excluding Depreciation & Amortization)			
10. Depreciation Expense			
11. Amortization Expense			
12. Customer Operations Expense			
13. Corporate Operations Expense			
14. Total Operating Expenses (8 thru 13)			
15. Operating Income or Margins (7 less 14)			
16. Other Operating Income and Expenses			
17. State and Local Taxes			
18. Federal Income Taxes			
19. Other Taxes			
20. Total Operating Taxes (17+18+19)			
21. Net Operating Income or Margins (15+16-20)			
22. Interest on Funded Debt			
23. Interest Expense - Capital Leases			
24. Other Interest Expense			
25. Allowance for Funds Used During Construction			
26. Total Fixed Charges (22+23+24-25)			
27. Nonoperating Net Income			
28. Extraordinary Items			
29. Jurisdictional Differences			
30. Nonregulated Net Income			
31. Total Net Income or Margins (21+27+28+29+30-26)			
32. Total Taxes Based on Income			
33. Retained Earnings or Margins Beginning-of-Year			
34. Miscellaneous Credits Year-to-Date			
35. Dividends Declared (Common)			
36. Dividends Declared (Preferred)			
37. Other Debits Year-to-Date			
38. Transfers to Patronage Capital			
39. Retained Earnings or Margins End-of-Period [(31+33+34) - (35+36+37+38)]			
40. Patronage Capital Beginning-of-Year			
41. Transfers to Patronage Capital			
42. Patronage Capital Credits Retired			
43. Patronage Capital End-of-Year (40+41-42)			
44. Annual Debt Service Payments			
45. Cash Ratio [(14+20-10-11) / 7]			
46. Operating Accrual Ratio [(14+20+26) / 7]			
47. TIER [(31+26) / 26]			
48. DSCR [(31+26+10+11) / 44]			

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USDA-RUS		BORROWER DESIGNATION	
OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS		ID0504	
		PERIOD ENDED December, 2015	
INSTRUCTIONS -- See help in the online application.			
PART I -- STATEMENT OF CASH FLOWS			
1. Beginning Cash (Cash and Equivalents plus RUS Construction Fund)			
CASH FLOWS FROM OPERATING ACTIVITIES			
2. Net Income			
<i>Adjustments to Reconcile Net Income to Net Cash Provided by Operating Activities</i>			
3. Add: Depreciation			
4. Add: Amortization			
5. Other (Explain) Change in Accrued Property Tax			
<i>Changes in Operating Assets and Liabilities</i>			
6. Decrease/(Increase) in Accounts Receivable			
7. Decrease/(Increase) in Materials and Inventory			
8. Decrease/(Increase) in Prepayments and Deferred Charges			
9. Decrease/(Increase) in Other Current Assets			
10. Increase/(Decrease) in Accounts Payable			
11. Increase/(Decrease) in Advance Billings & Payments			
12. Increase/(Decrease) in Other Current Liabilities			
13. Net Cash Provided/(Used) by Operations			
CASH FLOWS FROM FINANCING ACTIVITIES			
14. Decrease/(Increase) in Notes Receivable			
15. Increase/(Decrease) in Notes Payable			
16. Increase/(Decrease) in Customer Deposits			
17. Net Increase/(Decrease) in Long Term Debt (Including Current Maturities)			
18. Increase/(Decrease) in Other Liabilities & Deferred Credits			
19. Increase/(Decrease) in Capital Stock, Paid-in Capital, Membership and Capital Certificates & Other Capital			
20. Less: Payment of Dividends			
21. Less: Patronage Capital Credits Retired			
22. Other (Explain)			
23. Net Cash Provided/(Used) by Financing Activities			
CASH FLOWS FROM INVESTING ACTIVITIES			
24. Net Capital Expenditures (Property, Plant & Equipment)			
25. Other Long-Term Investments			
26. Other Noncurrent Assets & Jurisdictional Differences			
27. Other (Explain) Net Retirement of Assets			
28. Net Cash Provided/(Used) by Investing Activities			
29. Net Increase/(Decrease) in Cash			
30. Ending Cash			

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MOSS-ADAMS LLP
 Certified Public Accountants | Business Consultants

REPORT OF INDEPENDENT AUDITORS

The Board of Directors
 Albion Telephone Company, Inc.

Report on the Financial Statements

We have audited the accompanying consolidated financial statements of Albion Telephone Company, Inc. and subsidiary, which comprise the consolidated balance sheets as of December 31, 2015 and 2014, and the related consolidated statements of income, stockholders' equity, and cash flows for the years then ended, and the related notes to the consolidated financial statements.

Management's Responsibility for the Financial Statements

Management is responsible for the preparation and fair presentation of these consolidated financial statements in accordance with accounting principles generally accepted in the United States of America; this includes the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of consolidated financial statements that are free from material misstatement, whether due to fraud or error.

Auditor's Responsibility

Our responsibility is to express an opinion on these consolidated financial statements based on our audits. We conducted our audits in accordance with auditing standards generally accepted in the United States of America. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the consolidated financial statements are free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the consolidated financial statements. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the consolidated financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the entity's preparation and fair presentation of the consolidated financial statements in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control. Accordingly, we express no such opinion. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluating the overall presentation of the consolidated financial statements.

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Praxity
 MEMBER A

REPORT OF INDEPENDENT AUDITORS
(continued)

We did not audit the financial statements of Syringa Networks, LLC, the investment in which, as discussed in Note 2, is accounted for by the equity method of accounting. The investment in Syringa Networks, LLC was [REDACTED] and [REDACTED] as of December 31, 2015 and 2014, respectively, and the equity in its net income (loss) was [REDACTED] and [REDACTED] respectively, for the years then ended. Those statements were audited by other auditors, whose report has been furnished to us, and our opinion, insofar as it relates to amounts included by Syringa Networks, LLC, is based solely on the report of the other auditors.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

Opinion

In our opinion, the consolidated financial statements referred to above present fairly, in all material respects, the financial position of Albion Telephone Company, Inc. and subsidiary as of December 31, 2015 and 2014, and the results of their operations and their cash flows for the years then ended in accordance with accounting principles generally accepted in the United States of America.

Moss Adams LLP

Spokane, Washington
February 29, 2016

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Another great year!

- Another great year! Julie should start breathing easier now knowing the audit results are positive.

2015 AUDIT COMMENTS

CATV operations

Based on our discussions with you, there is a plan in place to cease cable TV operations during 2016 with the only revenues coming in being a fee from Direct or Dish to sign up new customers. With CATV operations coming to an end, we will likely be presenting the activities in the income statement as discontinued operations. This means that the revenues and expenses related to CATV will be presented as one amount as loss from discontinued operations. The benefit to segregating the service is you will have a true picture of the results of operations from the services you will continue to provide in the future.

Non-regulated CPR's

Albion continues to be diligent in updating the CPR's for regulated plant activity (both work order additions and retirements as needed). This same attention should be given to non-regulated equipment. We noted that the CPR detail for non-regulated assets do not agree to the trial balance. In addition to providing a detailed listing of assets, up-to-date CPR's ease in the retirement process. Currently, there have not been retirements from the Syringa plant accounts because the information isn't readily available. We recommend you work on building these records during 2016. This could either come from a review of the equipment lease detail updated annually or discussions with the plant department regarding the equipment still in use and items they know are no longer used. If the information you need can't be captured from the equipment lease detail, we recommend estimating the cost of the assets still in service. Once this information is up to date, we recommend having the plant department review the CPR's annually for retirements.

Account clean-up

There are a few accounts on the general ledger that have either very small balances or balances that have not changed for some time. We recommend reviewing the g/l balances and zero out the accounts as appropriate. The following are accounts we identified that could be adjusted in 2016:

- 1410.00 - ATCLD Note Receivable
- 1439.10 - Deferred insurance charges
- 2007.10 - Goodwill
- 2007.11 - Goodwill Reserve

We also noted that a couple of accounts (CATV and Syringa equipment) had been over-depreciated by a small amount. We recommend the CATV variance be adjusted to depreciation expense in 2016

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and the accounts will no longer need depreciated. We recommend reclassifying the variance from the Syringa electronics account to the Syringa fiber account and cease depreciating the electronics account. In addition, you will need to begin depreciating the special access account as there were additions at the end of the year.

Finally, all of the Zion's Bank payments are being applied against the older loan rather than splitting them between the old and new loan. We recommend correcting this in 2016.

Internal control testing

The purpose of our audit was to express an opinion on the financial statements and not to express an opinion on the effectiveness of internal control. That said, our audit procedures included consideration of internal control over financial reporting and procedures to test the effectiveness of internal controls that impact other procedures we perform to complete the audit.

Adjusting journal entries identified during the audit (and attached to this memo) are generally linked to a control deficiency.

- o We have reviewed the cause of all proposed and actual adjusting journal entries and determined that they do not rise to the level of significant deficiencies or material weaknesses.

NEW RULES, DEVELOPMENTS AND ACCOUNTING ALERTS

Ethernet Transport Services reporting

Effective January 1, 2016, NECA is requiring companies to begin reporting special access from Ethernet services separately from other special access to allow them to implement rate bands on ETS. We recommend in 2016 you begin recording revenues from ETS in a separate general ledger account from your other special access services. Separating this revenue stream will allow you to more easily reconcile the revenues you report to NECA with the general ledger and ensure the settlements you receive from NECA are accurate.

Going concern

This is an issue we traditionally have not been forced to deal with as an industry but have encountering more instances over the last few years. Historically the analysis of a company's ability to continue as a going concern has been the responsibility of the auditor with no specific requirements for management to conduct its own analysis. Accounting standards were revised to include management's responsibility. This standard will be effective for your December 31, 2016 audit. In addition to adding management's responsibility, the definition of substantial doubt has been clarified.

Substantial doubt about an entity's ability to continue as a going concern exists when conditions and events, considered in the aggregate, indicate that it is probable (likely to occur) that the entity

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will be unable to meet its obligations as they become due within one year after the date financial statements are available to be issued (ie - report date).

In the event there is substantial doubt, management should develop a plan of how they will mitigate those risks and the likelihood that the plan will be successful in mitigating substantial doubt. The bar has been raised on analyzing if management's plan actually alleviates substantial doubt. Substantial doubt is mitigated when it is probable that the plan will be implemented within one year and will mitigate the conditions. To be considered probable, the plan must be approved before issuance of the financial statements. For example, if a part of the plan is to refinance debt the company should have approval from the bank before the financial statements are issued.

If substantial doubt is alleviated, the conditions that caused the doubt along with the plans to reduce the risk will be disclosed in the footnotes. If substantial doubt is not alleviated, the conditions that caused the doubt will be disclosed in the footnotes along with an explanatory paragraph.

In 2016 you may receive additional requests from us related to the implementation of this standard.

Income Tax Comments

NAMA Implementation

In 2013 and 2014, Albion respectively elected the network asset maintenance allowance, or NAMA. Each year this allows for a 12% deduction of the cost of network assets placed in service. For 2015, the additional expense allowed to be taken on the tax return is [REDACTED]. This will help mitigate the gains from the reversal of bonus depreciation once it begins phasing out.

Depreciation

Congress decided just before the end of the year to once again extend the provisions of bonus depreciation through 2019 with phase downs over the time period. The modification allows 50% bonus depreciation through 2017, with reductions to 40% in 2018 and 30% in 2019. If your company's estimated tax deposits were calculated without the increased bonus deductions, you could be eligible for a refund of those taxes. This refund can be claimed on an expedited application if filed by March 15th, 2015. Otherwise it will be claimed when the tax return is filed. Our tax team will contact you to determine if you are eligible and calculate the amount of the potential refund. As the phase down begins, the income tax liabilities generated from bonus depreciation will begin reversing and result in increased taxable income. We will be working with you on the impacts to your company over the next couple years.

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Albion Telephone Company

2015 Audit Exit Memo

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COMMUNICATION WITH THOSE CHARGED WITH CORPORATE GOVERNANCE

Our responsibility under U.S. Generally Accepted Auditing Standards

Our responsibility, as described by professional standards, is to express an opinion about whether the financial statements prepared by management with your oversight are fairly presented, in all material respects, in conformity with U.S. generally accepted accounting principles. Our audit of the financial statements does not relieve you or management of your responsibilities.

Sensitive accounting policies and estimates

- Depreciation, Part 64 adjustments

Difficulties encountered in performing the audit

None

Corrected and uncorrected misstatements

See attached lists.

Disagreements with management

None

Management representations

We have requested certain representations from management that are included in the management representation letter dated as of the report date.

Management consultations with other independent accountants

None

Other audit findings or issues

No significant findings

Internal control deficiencies

No material weaknesses

Items communicated to RUS

No items to report

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Albion Telephone Company

2015 Audit Exit Memo

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Communication

Emailed and discussed with Rich Redman and Julie Laumb on 2/4/16

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